

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED

Nov 14 4 30 PM '01

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES

Docket No. R2001-1

**KeySpan Energy's Second Set Of Interrogatories And Document
Production Requests To USPS Witness Thomas A. Bozzo**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, KeySpan Energy submits the following interrogatories and document production requests to USPS witness **Thomas A. Bozzo: KE/USPS-T14-9**. If the designated witness is unable to answer any of these questions, please direct them to the appropriate witness who can provide a complete response.

Respectfully submitted,

KeySpan Energy

By: 

Michael W. Hall
34693 Bloomfield Road
Round Hill, Virginia 20141
540-554-8880

Counsel for

KeySpan Energy

Dated: Round Hill, VA
November 14, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing discovery request upon the United States Postal Service, the Designated Officer of the Commission, and participants who requested service of all discovery documents, in compliance with the Commission's Rules of Practice.

Dated this 14th day of November 2001.


Michael W. Hall

**KeySpan Energy's Second Set Of Interrogatories And Document
Production Requests For USPS Witness Thomas A. Bozzo**

KE/ USPS-T-14-9 Please refer to page 12 of Library Reference USPS-LR-J-60 where Mr. Miller presents his mail flow models for handwritten letters, worksheet "table" of Library Reference USPS-LR-J-56, and to page 4 of USPS-T-39, the Direct Testimony of USPS witness Linda A. Kingsley.

- A. Please confirm that it is a national policy of the Postal Service to have the AFCS lift images only of script mail, which can then be later sent to the REC if the addresses cannot be resolved by the RCR. If you cannot confirm, please explain.
- B. Please confirm that letters whose address images have been lifted in the AFCS that cannot be resolved by the RCR will be sent to the OSS for barcoding and sorting. If you cannot confirm, please explain.
- C. Please confirm that USPS witness Miller shows that for every 10,000 handwritten single piece letters that enter the RBCS ISS operation, 1,714 letters are sent through the OSS. If you cannot confirm, please explain.
- D. Please confirm that in Library Reference USPS-LR-J-56, you show that 26.042 billion pieces were fed into the ISS while 27.495 billion pieces were fed into the OSS. If you cannot confirm, please explain.
- E. Are the number of letters fed into the ISS and OSS roughly even, as you show in USPS-LR-J-56, or is Mr. Miller correct in assuming that the number of pieces fed into the ISS is roughly 5+ times that of the pieces fed into the OSS? Please explain your answer.